

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

WANSDOWN PROPERTIES CORPORATION N.V.,

Case No.: 19-13223 (SMB)

Debtor.

WANSDOWN PROPERTIES CORPORATION N.V.,

Plaintiff

Adv. Pro. No. 19-1450 (SMB)

v.

AZADEH NASSER AZARI,

Defendant.

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**STIPULATION CONCERNING THE UNSECURED CLAIMS OF GHOLAM REZA
GOLSORKHI**

WHEREAS, on October 21, 2019, Wansdown Properties Corporation N.V. ("Plaintiff") filed its bankruptcy schedules which lists on Form 206 E/F, Schedule E/F: Creditors Who Have Unsecured Claims, that Gholam Reza Golsorkhi holds two nonpriority unsecured claims in the amount of \$7,000,000 and \$480,000 (the "Claims");

WHEREAS, Plaintiff filed an action against Defendant Azadeh Nasser Azari ("Defendant") under Section 544(b) of the Bankruptcy Code on behalf of creditors; it is now therefore,

AGREED and STIPULATED, as follows:

1. Plaintiff will not use, or reference in any way, the Claims to support any of its allegations of insolvency for its remaining causes of action, the Third, Fourth, Fifth, and Sixth Causes of Action;¹
2. Defendant will not seek any discovery concerning the Claims from Plaintiff or any third-party.

Dated: June 14, 2021

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¹ Plaintiff and Defendant signed and filed a Stipulation of Dismissal of the First and Second Causes of Action (See ECF No. 22)